

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of New York

UNITED STATES OF AMERICA

v.

ASHLEY MCCLOSKEY,

Case No. 1:22-mj-322-DJS

Defendant.

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2019 through on or about May 8, 2020 in the county of Albany in the Northern District of New York the defendant violated:

*Code Section*

18 U.S.C. § 1952(a)(3)

*Offense Description*

In that the defendant used the mail or any facility in interstate or foreign commerce with intent to otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of any unlawful activity, specifically prostitution in violation of New York State Law and sex trafficking in violation of 18 U.S.C. § 1591.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

TFO Brandon J. Hudson, FBI

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: June 28, 2022

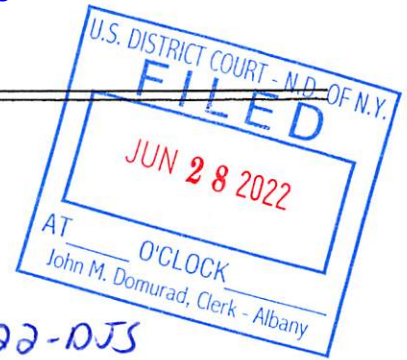


Judge's signature

City and State: Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title



**Affidavit in Support of a Criminal Complaint**

I, Brandon J. Hudson, having been first duly sworn, do hereby depose and state as follows:

**Introduction**

1. I am a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”). I have been a sworn member of the New York State Police (“NYSP”) since 2004 and have been serving as an NYSP Investigator since 2015. I am currently assigned as a TFO to the Albany Division of the FBI, with the Child Exploitation Task Force (“CETF”), located in Albany, New York. I have been an FBI TFO since 2017. My assignments include investigating violations of federal law — specifically, violent criminal offenses against children, including those involving the sexual exploitation of children. Your affiant has participated in the execution of numerous warrants involving the search and seizure of computers, computer equipment, software, and electronically stored information. I am an investigative or law enforcement officer of the United States within the meaning of Title 18 United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, including offenses related interstate prostitution and sex trafficking.

2. I make this affidavit in support of a criminal complaint and arrest warrant charging Ashley L. McCloskey (“MCCLOSKEY”), with the use of facilities of interstate commerce to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, specifically a prostitution and sex trafficking enterprise. Said enterprise was being operated by her co-conspirator CHRISTOPHER THOMAS in violation of offenses defined in Article 230 of the NYS Penal Law and multiple offenses in the U.S. Code which are related to interstate prostitution and sex trafficking.

3. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officials, information provided by witnesses, electronic and physical surveillance, and on my experience and training as an NYSP Investigator and FBI Task Force Officer. As this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that MCCLOSKEY has violated Title 18, United States Code, Section 1952(a)(3).

4. 18 U.S.C. § 1952(a)(3) provides in pertinent part, “Whoever...uses the mail or any facility in interstate or foreign commerce, with intent to otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity” is guilty of a crime. This affidavit will document MCCLOSKEY’s use of her vehicle, the internet, cellular phones, rental car agencies and Bank of America to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on, of the operation of a sex trafficking enterprise which victimized adults and minors.

**Probable Cause**

5. Beginning in August of 2019, the FBI initiated a formal investigation of CHRISTOPHER THOMAS, a/k/a “OMG” and JANELL GRADY, a/k/a “NELLY”, hereinafter THOMAS and GRADY, regarding their management of a prostitution business. This investigation determined that THOMAS and GRADY conspired to recruit, transport, harbor and advertise multiple females, including minors for commercial sex. The victims, who resided in New York and surrounding states were advertised online for commercial sex in the area of Albany, New York, and elsewhere.

6. While reviewing a social media account attributed to THOMAS, TFO Horstmyer noted that he posted an image on 05/23/2019, of himself making a deposit of \$10,000.00 cash into an ATM at a Bank of America. Pursuant to subpoenas, TFO Horstmyer was able to identify the account in which THOMAS deposited the currency as belonging to ASHLEY MCCLOSKEY of [Redacted Address], Albany, NY 12203. Additional investigative steps revealed that on 06/18/2019, THOMAS, an unlicensed NYS Parolee, had been stopped while operating a Chrysler 300 bearing NY registration GMG6404, which an inquiry with the NYS Department of Motor Vehicles confirmed is registered to MCCLOSKEY ("MCCLOSKEY's Car").

7. During the investigation, FBI surveillance confirmed that THOMAS was the primary user of MCCLOSKEY's Car, though GRADY also used it on a regular basis.

8. In December 2019, as the result of a parole violation, THOMAS was incarcerated in the Albany County, NY Correctional Facility. THOMAS remained there from 12/16/2019 – 01/21/2020, while he awaited sentencing on his parole violation and transfer to a NYS Department of Corrections facility. THOMAS was transferred to the Gowanda, NY Correctional Facility. After his transfer, TFO Horstmyer obtained copies of phone calls THOMAS made while he was incarcerated in the Albany County Correctional Facility. In sum and substance, a significant portion of those calls included THOMAS communicating with GRADY and MCCLOSKEY for the purpose of managing his sex trafficking enterprise. MCCLOSKEY would receive the phone calls from THOMAS on her cellular phone, 518-935-XXXX which utilized the Verizon network. After reviewing several calls between THOMAS and MCCLOSKEY, it became evident that she was aware that THOMAS was managing a commercial sex enterprise. The following examples illustrate MCCLOSKEY's knowledge of THOMAS' prostitution enterprise.

a) On 12/20/2019, MCCLOSKEY expressed that she did not like THOMAS

communicating with GRADY before her. THOMAS reminded MCCLOSKEY that GRADY is a source of income. THOMAS also explained to MCCLOSKEY that GRADY shouldn't be sleeping, just earning money. Based on my training, experience, and knowledge of the investigation, when THOMAS referred to GRADY as a source of income and stated she should not be sleeping and instead just earning money, he meant that GRADY should be engaged in commercial sex to earn proceeds for him.

- b) On 12/21/2019, THOMAS commented about the victims, "These bitches being least comfortable so they can get the bread, that's it, that's part of the game." THOMAS reiterated that his relationship with GRADY was business. THOMAS asked MCCLOSKEY to contact and motivate GRADY. MCCLOSKEY responded that she attempted to do that in the past and wasn't successful as GRADY was uncooperative. GRADY, MCCLOSKEY and THOMAS then engaged in a conference call. After GRADY hung up, THOMAS told MCCLOSKEY that she is not "pimping" GRADY.
- c) On 12/21/2019, MCCLOSKEY updated THOMAS on her communication with GRADY. MCCLOSKEY stated GRADY has a new girl with a driver's license and access to a vehicle. MCCLOSKEY told THOMAS that GRADY was sending money to a girl she was recruiting (for commercial sex) via CashApp. MCCLOSKEY told THOMAS that she instructed GRADY to hide the money from this new girl. At THOMAS' request, MCCLOSKEY established a conference call with GRADY. During that call, THOMAS reprimanded GRADY for sending too much money in advance to the girl she was recruiting

via Cashapp.

- d) On 12/29/2019, THOMAS told MCCLOSKEY that GRADY's brother threatened to tell people that GRADY was a prostitute whose pimp assaults her. MCCLOSKEY then initiated a conference call between herself, THOMAS and GRADY. During that call, THOMAS provided GRADY with specific instructions on the use of MCCLOSKEY's Car for transporting victims to commercial sex dates.

9. While incarcerated at the Albany County Correctional Facility, MCCLOSKEY and THOMAS were also able to communicate via the electronic messaging system Securus. The Albany County Sheriff's Office has provided copies of their messages, including the following.

- a) On 12/16/2019, MCCLOSKEY messaged THOMAS regarding her feelings about GRADY who was returning MCCLOSKEY's Car. MCCLOSKEY wrote, "I cant stand this bitch, she came and dropped the car just chatting and laughing away on the phone when she got in the uber. She loves it bc she has money in her pocket, apt and im sure she got her bud and has the room and bed now so shes set...you dont know how bad I wanted to curse her out earlier when she was trying to be fake and said 'im so madd ugh.'"
- b) On 12/16/2019, MCCLOSKEY messaged THOMAS complaining about damage GRADY caused to MCCLOSKEY's Car. MCCLOSKEY also complained that she now must have more contact with GRADY as THOMAS is incarcerated. MCCLOSKEY's message reads, "[N]ice to drive with no screen no control over temp or radio. When do I go out shopping and all that? Not really comparable to you being locked up! I also hate when u call her and tell her shit to tell me! like

shes dictating shit that I NEED TO DO bc shes fucking useless...you want her gone so bad why u even involving her in anything! i hate this bitch so dont expect me to help her at all! i know shes just sitting over there laid up not working not doing shit! so fucking irritating when shes messaging me AT WORK telling me I need to do this and that!”

- c) On 12/19/2019, MCCLOSKEY updated THOMAS regarding the status of GRADY returning MCCLOSKEY’s Car, stating “So this bitch drops the car then texts me and says she got into it with the lyft driver or something that he was going a different way than what she thought he should have and she said she made him turn around and go back. I dont freaking know bc I wasnt gonna entertain her shit, they probably are gonna charge her card extra now bc they charge based on the time and distance driven, plus the fact that she said he was aggravated...”
- d) On 12/20/2019, MCCLOSKEY messaged THOMAS to pass him a message from GRADY regarding females they are trafficking and GRADY’s inability to control the situation. MCCLOSKEY’s message also makes mention of GRADY using MCCLOSKEY’s Car and reads, “I guess youre not calling me back...did you speak to her after we spoke? She text me saying to have you call her ASAP somethig about the bitches there are trying some funny shit she said....so funny this bitch always wanna act tough but then can never handle anything herself! Always want me to tell u to call her! NO..you already call her more and then she thinks u just gonna say fuck talking to me and call her instead! this bitch got be so aggravated...Apparently no call bc she never mentioned using the car...”



- e) On 12/20/2019, MCCLOSKEY messaged THOMAS and complained about GRADY, referring to her by her nickname "Nelly". The messages reads, "Nelly is a drama queen and will say have him call me for everything! She thinks shes the important one and u already call her all th fucking time! She gonna say that just for you to call her period! Dont tell me to put my feelings and emotions aside! I did that once and still got fucked over! Im not doing it anymore! I hate this bitch but am forced to deal with her anyway bc of YOU!"
- f) On 12/21/2019, GRADY messaged THOMAS a picture of a new female she was attempting to recruit. The message contained evidence that MCCLOSKEY was directly involved in the sex trafficking. The message reads, "Hey I sent her pictures to you wish what he supposed to be on her way she's about three hours away I sent her \$50 for gas so she can get here I ran everything down to Ashley, Ashley and I've been communicating about the situation... I hope this girl comes I've been praying on it."
- g) On 12/21/2019, MCCLOSKEY messaged THOMAS updating him on GRADY's failed attempt at recruiting a female. The message reads "you never called me or messaged me back? I guess this chick never showed up smh thats why i said for her to only send \$20 now she out \$50...I guess the girl kept it up the entire time still answered the phone and said she was gonna be there in 15min lol but then didnt show...I said she gotta be some looney tune to keep it up the entire 3hrs smh..."
- h) On 12/21/2019, THOMAS messaged MCCLOSKEY regarding GRADY's failed attempt at recruiting the female stating "Told her the girl played her....fukkin



dummy...its not funny that's my rent money, baby!!!! I'm in the cell...was tryna make some money to send her stupid ass...I wish I was there with you!! I miss you!!”

- i) On 12/23/2019, GRADY advised THOMAS she had a date and inquired about using MCCLOSKEY's Car for transportation. The message reads, “Hey I have a call at 7 o'clock in glens Falls with my regular .. tryna find a ride if Ashley works.. and I'm just hanging around the crib. Just showered again. Bored”.
- j) On 12/23/2019, GRADY messaged THOMAS to ask permission to rest and advised him regarding the status of MCCLOSKEY's Car. The message reads “Daddyyy is it cool if I lay down? ;\* I'm way too tired, I keep checking the tablet to see if youu writinn me & you don't ;( .. took Fendi out to play and im I'm getting sleepy I texted Ashley where I put the car n filled it up and so on.”.
- k) On 12/26/2019, GRADY messaged THOMAS advising him that MCCLOSKEY's Car wasn't available for prostitution dates. The message reads, “Hey... had a calls. And tonight 300 . So I'm happy. I'm in a Uber back from a date now. To angelos , I'm being responsible n safe n of course being loyal the best way I can . I'm staving but I'm so eager to see this pile stack up ! Ashley didn't hit me back for the car so I had to do ubers”.
- l) On 12/26/2019, MCCLOSKEY messaged THOMAS regarding GRADY being “too comfortable” and her potential use of MCCLOSKEY's Car for reasons other than prostitution. The message reads “I thought u said this bitch getting too comfortable and you didnt want her using the car??? For some reason she asked multiple times today...first time I was asleep and now she asking again? Feel like

she gonna ask just to ask to use it for when she wants to drive anywhere...”.

- m) On 12/26/2019, THOMAS messaged MCCLOSKEY regarding GRADY’s date in Saratoga and the use of MCCLOSKEY’s Car. Specifically, the rules that GRADY must refuel MCCLOSKEY’s Car and keep her informed regarding her travels with it. The messages reads “She has suddn in Saratoga she said to me...I told her you were sleep and you weren't gonna see that shit...she took a uber to that one earlier...she needs the money for me so I don't care as long as she fills the tank and texts you her every move and it adds up...”
- n) On 12/26/2019, MCCLOSKEY messaged THOMAS regarding how her vehicle should be returned after GRADY is finished using it. The message reads “what you mean cost her to park in the garage? Shes bringing it back when shes done and parking it then walking out the garage...”
- o) On 12/27/2019, MCCLOSKEY messaged THOMAS complaining about how GRADY returned her vehicle stating “ok,smh...Im sure you talked to this bitch today...Was aggravated this morning bc I get out of work and had to look for this fucking car again! I text her was like I thought I asked you to park the car where you get it!! no where near it, in fact its where she parked before where I told her the first fucking time! and the panic button doesnt even work when I come out to look bc like i said its all the way on the other side so im wondering around again lookinh for this fucking car! then I get in and she runs a half tank out the car, didnt put gas in it! So Im like wtf!”
- p) On 01/02/2020, GRADY advised THOMAS that she had taken pictures for prostitution ads and updated MCCLOSKEY. The message reads “I'm not sure if

- you're getting these but I stopped by her house I took pics and updated Ashley”.
- q) On 01/04/2020, MCCLOSKEY mentioned a specific commercial sex worker by her nickname “E” and complained about GRADY’s lack of motivation to obtain prostitution dates. MCCLOSKEY also informed THOMAS that GRADY’s last prostitution date was an “IN”, meaning in-call at GRADY and THOMAS’ apartment. The message reads “so she still has the car...She text before 2am that E wanted to go home but she was too tired to take her home so E took an uber and that she was lying down...so having the car didnt keep her anymore motivated than normal...she knows damn well that it was highly unlikely she get a call for herself and her lying down she wasnt gonna get back up for no other call, especially if she was toooo tired to take chick home! That IN was the last call she had...”
- r) On 01/08/2020, MCCLOSKEY updated THOMAS on the status of a female that was working for GRADY (“Nelly”). MCCLOSKEY informed THOMAS that the girl had to return home and didn’t make much money due to her appearance. The message reads, “I guess you couldnt call again...Im at work, Nelly said the other girl had to go back home today her bf was gonna come get her or something...I guess she didnt really do all that great..Nelly said she was bigger than what her pictures showed....love u”.
- s) On 01/09/2020, MCCLOSKEY messaged THOMAS advising him that she had provided direction to GRADY. The message reads “earlier she said she sat down with them and had an hour talk and everything is good now, smh...so i gave her my little two sense and she said ‘ok I hear you’ and havent heard from her

since...so shes got everything figured out...”

10. On May 8, 2020, members of the FBI and other law enforcement officers executed a search warrant at THOMAS’ and GRADY’s residence in Albany, NY. While on scene, GRADY was arrested for her role in transporting an adult female from Vermont to New York for the purpose of working in commercial sex for THOMAS. On May 12, 2020, the FBI arrested THOMAS following his release from the Gowanda Correctional Facility where he was being held on the parole violation.

11. During this investigation, TFO Horstmyer has been able to identify multiple female victims, including minors who were advertised online by THOMAS and/or GRADY for commercial sex. One of the phone numbers featured in commercial sex ads, 518-313-1353 was assigned to Pinger Inc., an internet-based text message application. The number appeared in commercial sex ads for several victims and customers contacted it to schedule dates. The investigation determined that THOMAS was the account subscriber and exercised control over it. Pursuant to a subpoena Pinger provided the IP addresses which were utilized to access THOMAS’ account. On multiple dates, from May 2019 – September 2019, the Pinger account was accessed from IP address 108.183.16.237, a Charter Communications IP. Pursuant to a subpoena, Charter Communications identified the subscriber of the IP Address as MCCLOSKEY at her residence.

12. Examples of commercial sex ads featuring minors and the Pinger phone number are summarized below. MCCLOSKEY’s IP address was used to access the Pinger account on the dates each of these ads were posted.

- a) An ad dated 08/01/2019, featuring images of a nude 16-year-old female who has been identified and interviewed by the FBI. The ad offers services to include

“Oral-without condom (BBBJ)” and “Intercourse-Vaginal (FS)”.

- b) An ad dated 07/31/2019, featuring images of a 16-year-old female, who has been identified by the FBI, posing on a bed wearing lingerie. The ad offers services to include “The ad offers services to include “Intercourse-Oral” and “Intercourse-Vaginal (FS)”.
- c) An ad dated 07/25/2019, featuring images of a 17-year-old female, who has been identified by the FBI, wearing lingerie. The ad offers services to include “The ad offers services to include “Oral-without condom (BBBJ)” and “Intercourse-Vaginal (FS)”.

13. The investigation also determined that THOMAS utilized the social media application Facebook to recruit commercial sex workers and/or victims. THOMAS would message females with promises of making large sums of money under his direction. TFO Horstmyer have reviewed the IP logs of both Facebook accounts that THOMAS utilized to recruit females. Both accounts were routinely accessed through MCCLOSKEY’s assigned IP address of 108.183.16.237.

14. On May 8, 2020, MCCLOSKEY was interviewed during the execution of a search warrant at her residence in Albany, NY. MCCLOSKEY was advised that she was not under arrest, was not in custody, was under no obligation to speak with law enforcement and was free to leave. During her interview, in sum and substance, MCCLOSKEY made the following admissions.

- a) MCCLOSKEY identified THOMAS as her boyfriend of over four years.
- b) MCCLOSKEY provided THOMAS with large sums of money which he utilized to make videos for the social media application Facebook. THOMAS utilized

Facebook to recruit girls to work for him in commercial sex. THOMAS told MCCLOSKEY that he recruited the girls into prostitution through messaging them on Facebook. MCCLOSKEY met a “couple” of the girls that were working for THOMAS.

- c) GRADY is a prostitute who resided with and worked for THOMAS. THOMAS hadn’t held an actual job in approximately two years. GRADY provided the proceeds of her acts of prostitution to THOMAS.
- d) MCCLOSKEY permitted THOMAS, a NYS Parolee, to store what she believed to be a real firearm inside her residence (*Determined to be Imitation Pistol*).
- e) MCCLOSKEY was aware that THOMAS and GRADY had gone to Massachusetts for the purpose of her engaging in prostitution.
- f) MCCLOSKEY would give GRADY her vehicle to engage in prostitution. In the past, MCCLOSKEY also rented vehicles on 2-3 occasions for GRADY to engage in prostitution. MCCLOSKEY identified the rental car companies from which she rented the vehicles.
- g) THOMAS does not have a car of his own. MCCLOSKEY permitted THOMAS to routinely utilize her vehicle, a Chrysler 300 sedan, to transport GRADY and other persons for the purpose of commercial sex.
- h) THOMAS has transported females out of state, including Springfield, MA to engage in commercial sex.
- i) MCCLOSKEY was aware of GRADY’s alias, which was featured in commercial sex ads, specifically “Krissy”. In the past, she was advertised on backpage.
- j) MCCLOSKEY would lend GRADY money for rent.

- k) MCCLOSKEY provided her phone number.
- l) MCCLOSKEY was familiar with the term “Bottom” as THOMAS had explained it to her. MCCLOSKEY defined that position as the “Main Girl” who does what THOMAS says. The “Bottom” is also responsible for recruiting other girls into engaging in prostitution for THOMAS’ financial benefit. MCCLOSKEY identified GRADY as THOMAS’ “Bottom”.
- m) MCCLOSKEY was aware that THOMAS brought a female into New York from Vermont to work in prostitution.
- n) MCCLOSKEY explained that the \$5,000.00 seized from her apartment during the search warrant was withdrawn by her because THOMAS wanted to post pictures upon his release from prison.
- o) MCCLOSKEY was advised that online services, utilized by THOMAS in furtherance of sex trafficking, were accessed from her IP Address. MCCLOSKEY confirmed that while at her apartment, THOMAS would tell MCCLOSKEY that he was posting ads.
- p) In the past, when the commercial sex advertising website Backpage went down and THOMAS was incarcerated, MCCLOSKEY did an online search to identify other websites GRADY could advertise herself on for prostitution. (Backpage was seized in April 2018).
- q) MCCLOSKEY was able to identify multiple females by their first names that have worked for THOMAS in the past.

15. As part of this investigation, the FBI forensically analyzed cellular phones which had been seized from GRADY. One of the devices contains extensive communications between



GRADY and MCCLOSKEY. These communications occurred between 02/03/2020 – 04/23/2020, a period that THOMAS was incarcerated and not present to directly supervise and victimize GRADY. Examples of the relevant messages are summarized below.

- a) On 02/03/2020, GRADY updated MCCLOSKEY on her status, messaging her “Got my period before Glens falls, he want the white girl that’s with me now he wants her tomorrow. MCCLSOKEY acknowledges that status update from GRADY by stating “Ok”.
- b) On 02/06/2020, in sum and substance, GRADY messaged MCCLOSKEY explaining that she was stressed, having chest pains, wasn’t eating and was only trying to save money. MCCLOSKEY responded “Man you act like you’re the only one, smh it’s called being an adult and having priorities”.
- c) On 02/06/2020, GRADY messaged MCCLOSKEY stating “I’m just not comfortable it’s making me feel like a prostitute that selling my pussy and still can’t pay her bill n eat. It’s embarrassing and shameful”, “As a women...”. MCCLOSKEY, who was employed as a nurse stated, “I’m saying all I do is work home school and save all my money”, she then states “I get what your saying but u also know with that kind of hustle theres lows and highs” and “That’s why u take full advantage of the highs”.
- d) On 02/10/2020, MCCLOSKEY questioned GRADY about her work in prostitution known as “calls”, she informed MCCLOSKEY that she and the other girls weren’t getting customers. GRADY mentioned that she may travel to Springfield, MA to seek out customers. MCCLOSKEY asked GRADY “Still no calls?”. GRADY responded “Not yet. I really need to go sit in Spfld the girls r

even getting discouraged” and “My reg in the woods will prolly see me tonight he said”. MCCLOSKEY instructed GRADY to keep her updated stating “Ok let me know.”

- e) On 02/15/2020, MCCLOSKEY provided GRADY with direction on how to manage multiple girls. MCCLOSKEY asked “Where the two girls located?” GRADY responded “Ellenville” and asked “If Catskill says no keep the car or bring it back? If I’m goin in the am I thought to keep it.” MCCLOSKEY responded, “So if these two chicks are down and u can see if the Troy chick is too, why don’t u pick up these chicks in the morning and then head straight to Springfield.” MCCLOSKEY offered further directions regarding the arrangement of dates with regular customers and the expenses related to the trip to Massachusetts. MCCLOSEY stated, “Set up regulars from now and everyone can pitch in gas and hotel.”
- f) On 02/16/2020, MCCLOSKEY passed direction from THOMAS who was incarcerated to GRADY regarding her work in prostitution and what to do with the girls working for them. MCCLOSKEY stated, “He said to hit up regs including west sand lake about the new chicks”, “He said to take all new pic” and “If this chick doesn’t make money then she gotta find her own way back”. MCCLOSKEY passed along further direction from THOMAS regarding the pictures GRADY was told to take for commercial sex ads. MCCLOSKEY stated, “He said make them interesting and not just same boring pic” and “He said to have the new girl do makeup and put her face up”.
- g) On 02/16/2021, MCCLOSKEY offered direction to GRADY who updated her on

a victim. MCCLOSKEY stated, "Well the two of u could go out to Springfield during the week...take the bus and split the hotel if you have calls out there."

GRADY then updated MCCLOSKEY on the status of a female that is working for them stating, "Okay, I think she do dope...or suboxons...she's a bit off.....", "I think she does strips, she's just weird", "Someone wants me in Watervliet I think" and "I'm waiting ona reg now." MCCLSOKEY confirmed that she received GRADY's update by stating, "Ok".


- h) On 02/18/2020, communications confirm MCCLOSKEY's admission that her vehicle was used to facilitate prostitution. GRADY asked, "Hey can I pick it up for the Outcall reg ?" MCCLOSKEY responded "I guess" and "Its in the garage".
- i) On 02/22/2020, MCCLOSKEY and GRADY discussed a female working for her and transportation. GRADY stated, "I'm getting calls tho. She;s not going home she right hee. She just mad I needed that 80". MCCLOSKEY responded Yeah", "Just try to smooth it over lil" and "Bc u need her right now for the weekend calls". GRADY responded by agreeing with MCCLOSKEY's direction to be cordial with the girl. GRADY also updated MCCLOSKEY that the girl may have a commercial sex date with a regular customer in West Sand Lake, NY. The messages from GRADY read "Dang", "U right" and "I'm almost back maybe one in west sans [sic] lake her regular". GRADY then asked MCCLOSKEY "Can I bring her to get a bag of clothes", MCCLOSKEY asks "Where". GRADY responds "Lansingburgh her moms house."

16. As part of this investigation, the FBI executed a search warrant on an Apple iCloud account attributed to THOMAS. The account was found to contain messages (Conversations)

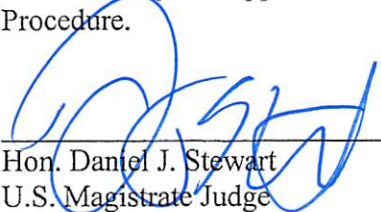
between THOMAS' known phone number of 518-461-1213 and MCCLOSKEY's known phone number. The messages contain evidence that MCCLOSKEY was aware that GRADY was being physically abused by THOMAS. Messages dated 12/13/2019, demonstrate that MCCLOSKEY was aware that THOMAS beat GRADY after she damaged MCCLOSKEY's Car. MCCLOSKEY had provided the vehicle to THOMAS to assist in his sex trafficking enterprise. Specifically, when discussing a screen that GRADY damaged in MCCLOSKEY's Car, THOMAS messaged MCCLOSKEY stating "Just knocked her out". As they continued to message each other, MCCLOSKEY expressed that she no longer wanted GRADY to use the vehicle and also stated "Tired of these fucking bitches fucking up that car that I'm paying for". Based upon a review of the conversation, it appears MCCLOSKEY and GRADY then began communicating regarding the damage to the vehicle. THOMAS warned MCCLOSKEY "Stop texting her" and "Your leaving evidence on her phone". MCCLOSKEY acknowledged THOMAS' warning stating "Don't care" and "Fuck her".

17. During her interview, MCCLOSKEY acknowledged that she rented vehicles for GRADY to be used for prostitution. In an interview, GRADY confirmed that MCCLOSKEY rented vehicles for her and another female to engage in prostitution. GRADY identified multiple rental car companies that MCCLOSKEY utilized. Pursuant to a subpoena, the investigation determined that between January 2016 – October 2019, on 14 occasions, MCCLOSKEY rented vehicles from a company that GRADY identified which were picked up and returned in the area of Albany, NY.

18. Based upon the above information, probable cause exists that MCCLOSKEY violated Title 18, United States Code, Section 1952(a)(3). I request that a criminal complaint be issued pursuant to this violation of federal law.

  
\_\_\_\_\_  
Brandon J. Hudson  
Task Force Officer  
Federal Bureau of Investigation

Attested to by the Applicant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

  
\_\_\_\_\_  
Hon. Daniel J. Stewart  
U.S. Magistrate Judge